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COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS AND ON THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS

Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals

Fifteenth session Geneva, 9-11 July 2008 Item 2 (b) of the provisional agenda

UPDATING OF THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS (GHS)

Health hazards

Corrections to tables 3.8.1, 3.9.1 and 3.9.2 of the GHS

Transmitted by the expert from Germany */

Units in table 3.8.1

1. Reference is made to the contents of the column "Units" in table 3.8.1 (Chapter 3.8) of the GHS. The expert from Germany has noticed that while for inhalation of dusts/mists/fumes, the exposure time is indicated in the units, no indication is given for the inhalation of gas and vapours. In his opinion, this is a gap which causes uncertainty.

2. As stated in document ST/SG/AC.10/C.4/2008/12, the guidance values for categories 1 and 2 are supposed to be identical to the Acute Toxicity Estimate (ATE) values for categories 3

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^{*/} In accordance with the programme of work of the Sub-Committee for 2007-2008 approved by the Committee at its third session (refer to ST/SG/AC.10/C.4/24, Annex 2 and ST/SG/AC.10/34, para. 14).

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and 4 of acute toxicity (Chapter 3.1, table 3.1.1). Note (b) to table 3.1.1, which applies to inhalation of gases, vapours, dusts and mists, states that the inhalation cut-off values are based on 4 hour testing exposures. However, in chapter 3.8 there is no indication either in the text or in table 3.8.1 with respect to the exposure time for inhalation of gases and vapours. The expert from Germany is of the opinion that the exposure time has to be indicated also for those entries.

Proposal

4. The Sub-Committee is invited to consider the following corrections (to be included in a corrigendum to the second revised edition of the GHS) to the units for inhalation of gas and vapour in table 3.8.1 (new text is underlined):

Route of exposure	Units
Inhalation (rat) gas	ppm <u>/4h</u>
Inhalation (rat) vapour	mg/1 <u>/4h</u>

Guidance values in tables 3.9.1 and 3.9.2

5. In tables 3.9.1 and 3.9.2 (Chapter 3.9) of the GHS identical figures are used for the same route of exposure, on one hand for the upper guidance value of category 1 and on the other hand for the lower guidance value for category 2.

6. For example, for the oral route, the guidance value for classification in category 1 in table 3.9.1 is 10 mg/kg bw/d but, according to table 3.9.2, the same guidance value could also justify the classification of the substance in category 2. The same rule applies to the other routes (see table below).

Route of exposure	Guidance values in table 3.9.1 for category 1	Guidance values in table 3.9.2 for category 2
Oral (rat)	10	10 - 100
Dermal (rat or rabbit)	20	20 - 200
Inhalation (rat) gas	50	50 - 250
Inhalation (rat) vapour	0.2	0.2 - 1.0
Inhalation (rat) dust/mist/fume	0.02	0.02 - 0.2

7. The expert from Germany thinks that identical cut-off guidance values should not allow the classification of the substance into two different categories and that the most stringent value should be allocated to the most hazardous category. This would be in line with the criteria used for other hazard classes (e.g. specific target organ toxicity, table 3.8.1).

Proposal

8. The Sub-Committee is invited to consider the following corrections (to be included in a corrigendum to the second revised edition of the GHS) to the guidance values in tables 3.9.1 and 3.9.2:

Route of exposure	Guidance values in table 3.9.1 for category 1	Guidance values in table 3.9.2 for category 2
Oral (rat)	≤ 10	$10 - 100 - 10 > C \le 100$
Dermal (rat or rabbit)	≤ 20	$20 - 200 - 20 > C \le 200$
Inhalation (rat) gas	≤ 50	$50 - 250 - 50 > C \le 250$
Inhalation (rat) vapour	≤ 0.2	$0.2 - 1.0 - 0.2 > C \le 1.0$
Inhalation (rat) dust/mist/fume	≤ 0.02	$0.02 - 0.2 - 0.02 > C \le 0.2$
